

APPENDIX O

MONITORING AND EVALUATION

The City of Seattle Human Services Department is responsible for the overall administration of the Consolidated Plan and the monitoring and evaluation of CDBG program activities as well as the HOPWA and ESG programs. Office of Housing manages the HOME program. The organizational structure developed to implement the Consolidated Plan has two layers of accountability. The first tier encompasses the operating departments that implement programs with city staff. The second tier encompasses programs implemented by subrecipients and other entities.

Organizational Framework

The housing and community development and human service delivery system in Seattle is composed of a number of complementary components. Key public partners include the City of Seattle's Human Services Department, Office of Housing, Office for Economic Development, Department of Finance, Department of Neighborhoods, Parks Department, the Seattle-King County Department of Public Health, and the Seattle Housing Authority. Nonprofit agencies are many and varied: Seattle Housing Development Consortium, Seattle Human Services Coalition, Seattle Minority Executive Director's Coalition, other nonprofit housing developers, community development corporations, provider coalitions, human services and shelter providers, and agencies working with special needs populations.

Within the Human Services Department, the CDBG Administration Office provides centralized monitoring and support to CDBG programs delivered through City offices and agencies.

Each year HSD executes Memoranda of Agreement (MOA) with the city departments that administer CDBG funded programs.

Regulatory Framework

The CDBG regulations (24CFR 570.501 (b)) state that:

"[the grantee] is responsible for ensuring that CDBG funds are used in accordance with all program requirements. The use of ...subrecipients...does not relieve the recipient of this responsibility. The recipient is also responsible for determining the adequacy of performance under subrecipient agreements...and for taking appropriate action when performance problems arise..."

The language in Subpart J of 24 CFR Part 85 "Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments," which applies to HUD grants including CDBG, HOPWA, ESG and HOME, is even more explicit about the obligation to monitor subgrant supported units including city programs and sub-recipients:

"Grantees are responsible for managing the day-to-day operation of grant and subgrant supported activities to assure compliance with applicable Federal requirements and that performance goals are being met. Grantee monitoring must cover each program, function, or activity."

MONITORING OBJECTIVES

The City of Seattle has three objectives in its monitoring and evaluation program:

- Ensure that grant funded activities comply with federal regulations governing administrative, financial, and programmatic operations;
- Ensure that, to the extent feasible, performance objectives are met within budget and on schedule; and,
- Ensure that city departments operate their programs in accordance with established program policies.

MONITORING AND EVALUATION PROGRAM

CDBG implementation occurs in two tiers. The first tier includes the five operating departments. These five departments implement certain activities with city staff. The second tier includes those grant-funded activities carried out by subrecipients, borrowers, and community-based development organizations, among others.

Monitoring

The HSD CDBG Administration Office provides oversight and technical assistance to city staff and participates as needed in assessments and monitoring visits. Memoranda of Agreement with the each of the operating departments specify that they will:

- (1) Assure and certify that department complies with federal regulations, policies, guidelines, and requirements with respect to the acceptance and use of CDBG funds as specified by HUD;
- (2) Prior to incurring costs, ensure that each project has had an environmental review and, where appropriate with respect to construction projects, that Davis Bacon and Section 3 requirements are met;
- (3) Prepare a program plan and budget as required and submit the plan or contract to HSD so eligibility can be determined;
- (4) Provide annual data to ensure that the appropriate national objective is met; and,
- (5) Meet financial requirements by ensuring all costs are documented and supported.

Tier I

Tier I tasks are directed to ensure that the operating departments are meeting their obligations under the Memoranda of Agreement with respect to programs implemented directly by city staff. To do so, the CDBG Administration staff will perform three tasks:

1. Monitor activities implemented by City staff. Some examples are: Multi-Family Housing Fund, Park Upgrades, Community Facilities RFP, Community Economic Development Program, Public Housing Case Management.
2. Work with each operating department to help establish and/or evaluate the system of monitoring and assessment of subrecipients and other entities including on-site assessment and desk monitoring procedures.
3. Provide up-front technical assistance on eligible activities and other regulatory matters.

Tier II

Tier II tasks are directed to subrecipients and other entities. In addition, CDBG Administration staff will provide oversight on the operating department accountability and their systems and procedures for monitoring or evaluating grant-funded programs. CDBG Administration Office staff will assist city staff to develop monitoring checklists and other tools so that they are able to assess compliance with federal requirements including eligibility and benefit to low- and moderate-income persons. When possible, CDBG staff will participate in on-site monitoring activities. Oversight activities will include:

1. Review of the risk analysis and criteria used to determine what agencies and projects are selected for on-site monitoring or a full assessment.
2. Review project files to determine that there are: appropriate documentation of project oversight through monthly desk monitoring, documentation of on-going contact (telephone or on site) between the project specialist and the implementing agency identifying problems and solutions.
3. Review annual monitoring results and three-year in depth formal assessment performed by program staff.

EVALUATION

Each year the CDBG Administration staff, with the assistance of program staff from all operating departments, prepares the Consolidated Annual Performance and Evaluation Report. During this time, we determine to what extent objectives and performance targets have been met. The evaluation is made easier by an outcome-based approach. Using this methodology requires that programs have key results and outcomes that can be tracked and evaluated.